

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE

|                           |   |                               |
|---------------------------|---|-------------------------------|
| UNITED STATES OF AMERICA, | : |                               |
|                           | : |                               |
| Plaintiff,                | : |                               |
|                           | : |                               |
| v.                        | : | Criminal Action No. 07-42-JJF |
|                           | : |                               |
| THOMAS DAVIS,             | : |                               |
|                           | : |                               |
| Defendant.                | : |                               |

**MOTION TO EXTEND TIME TO FILE PRE-TRIAL MOTIONS**

Defendant, Thomas Davis, by and through his undersigned counsel, Eleni Kousoulis, hereby moves the Court pursuant to Federal Rule of Criminal Procedure 45(b) and Local Rule 5(a) for an Order enlarging the time within which pre-trial motions may be filed. In support of this motion the Defendant submits as follows:

1. Pre-trial motions in this case are due by June 1, 2007.
2. Defense counsel has met with Mr. Davis several times in regard to his case.

However, Mr. Davis is having a difficult time understanding some of the issues involved with his case, and defense counsel requires additional time to meet with Mr. Davis to determine what, if any pre-trial motions should be filed in this case.

3. The defense respectfully requests an extension of time of 30 days in which to file any pre-trial motions, to allow defense counsel adequate time to meet with Mr. Davis to insure that he fully understands all aspects of his case, and to determine what pre-trial motions need to be filed.

4. AUSA Shawn Martyniak, counsel for the government, has no objection to the

defendant's motion for an extension of time in which to file pre-trial motions, making the motion unopposed.

5. The parties have agreed that any additional time given in which to file pre-trial motions will be excludable under the Speedy Trial Act.

WHEREFORE, it is respectfully requested that the time for Defendant to file pre-trial motions be extended until anytime after July 1, 2007.

Respectfully Submitted,

/s/  
\_\_\_\_\_  
Eleni Kousoulis, Esquire  
Assistant Federal Public Defender  
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Attorney for Defendant Thomas Davis

Dated: May 29, 2007

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FOR THE DISTRICT OF DELAWARE

|                           |   |                               |
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| UNITED STATES OF AMERICA, | : |                               |
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| Plaintiff,                | : |                               |
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| v.                        | : | Criminal Action No. 07-42-JJF |
|                           | : |                               |
| THOMAS DAVIS,             | : |                               |
|                           | : |                               |
| Defendant.                | : |                               |

**ORDER**

Having considered Defendant's Motion to Extend Time to File Pre-trial Motions,

**IT IS HEREBY ORDERED** this \_\_\_\_\_ day of \_\_\_\_\_, 2007, that Defendant  
Davis' pre-trial motions shall be due on the \_\_\_\_\_ day of \_\_\_\_\_, 2007.

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Honorable Joseph J. Farnan, Jr.  
United States District Court